

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**LONGFIN CORP. and
VENKATA S. MEENAVALLI,**

Defendants.

Case No.: 19-cv-5296-DLC

**NOTICE OF MOTION AND
MOTION FOR AN ORDER TO
SHOW CAUSE**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, upon the accompanying Motion, Memorandum, and Proposed Order, and all related papers and proceedings, Plaintiff, the Securities and Exchange Commission (the “SEC”) will move this Court, at a date and time to be determined by the Court, for an Order to Show Cause why the Court should not:

1. Establish a Fair Fund pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002 (“Section 308(a)”) for all funds under the Court’s jurisdiction in the captioned matter; and
2. Approve the SEC’s proposal to combine approximately \$300,000 in disgorgement, prejudgment interest, and civil penalty collected from the defendants in this action, plus any accrued interest and future collections, with the Fair Fund established in the related action before this Court, *SEC v. Longfin, et al.*, 18-cv-2977-DLC (the “Related Action”), for distribution to harmed investors pursuant to the Court-approved distribution plan in that action (the “Related Action Plan”).

MOTION

Plaintiff, the SEC, respectfully submits this Motion for an Order to Show Cause why the Court should not: (i) establish a Fair Fund pursuant to Section 308(a) for all funds under the Court's jurisdiction in the captioned matter; and (ii) approve the SEC's proposal to combine the approximately \$300,000 in collections in this action, plus any accrued interest and future collections, with the Fair Fund established in the Related Action for distribution to harmed investors pursuant to the Related Action Plan. A proposed Order to Show Cause is being filed simultaneously, and the details of the proposed disposition of collections in this matter is described more fully in the accompanying memorandum (the "Memorandum").

Also accompanying this Motion is a Declaration under Local Rule 6.1(d) setting forth the reasons for the issuance of the proposed Order to Show Cause. Upon the completion of the steps set forth in the Order to Show Cause, the SEC will file a notice so informing the Court and responding to any objections, and provide a proposed Order approving the SEC's proposal or an amended proposal, as appropriate.

WHEREFORE, the SEC respectfully requests that the Court enter an Order to Show Cause substantially in the form attached as Exhibit 1 to this Motion.

Date: August 13, 2020

Respectfully submitted,

s/ _____
Catherine E. Pappas
Admitted *Pro Hac Vice*, ECF No. 51
Email: pappasc@sec.gov
1617 JFK Blvd., Ste. 520
Philadelphia, Pa. 19103
Tel: (215) 597-0657
Fax: (215) 597-2740
*Attorney for Plaintiff Securities and
Exchange Commission*

CERTIFICATE OF SERVICE

I, Catherine E. Pappas, hereby certify that, on August 13, 2020, I caused the foregoing motion and accompanying documents to be electronically filed with the clerk of the court for the U.S. District Court of Southern District of New York, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

In addition, I will send the foregoing filing by UPS to (i) Legalinc Corporate Services, Inc., 651 North Broad Street, Suite 206, Middletown, DE 19709 (Longfin’s registered agent); and (ii) McManimon, Scotland & Baumann, LLC, 75 Livingston Avenue, Suite 201, Roseland, NJ 07068, Attn: Michele M. Dudas (Longfin’s Assignee for the Benefit of Creditors in Monmouth County, New Jersey).

s/ Catherine E. Pappas
Catherine E. Pappas
Counsel for Plaintiff